

# Exhibit 6

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

SONOS, INC.,	§	
<i>Plaintiff,</i>	§	
	§	
	§	CIVIL ACTION 6:20-cv-00881-ADA
v.	§	
	§	
	§	
GOOGLE LLC	§	
<i>Defendant.</i>	§	

**PLAINTIFF’S SECOND SET OF INTERROGATORIES TO DEFENDANT (NOS. 6-11)**

Pursuant to Rule 34 of the Federal Rules of Civil Procedure and Standing Order Regarding Venue and Jurisdictional Discovery Limits For Patent Cases, Plaintiff Sonos, Inc. (“Sonos”) respectfully requests that Defendant Google LLC (“Google”) answer the following interrogatories, separately and fully in writing and under oath, within thirty days. This is a continuing request for information as it becomes available to you.

**DEFINITIONS AND INSTRUCTIONS**

1. Sonos incorporates by reference, as if fully set forth herein, the Definitions and Instructions set forth in Sonos’s First Set of Interrogatories to Defendant.
2. The term “Content Integration Agreement” refers to the November 14, 2013 Content Integration Agreement between Google and Sonos, as well as any amendments or extensions thereto.
3. The term “Chromecast enabled devices” includes, but is not limited to, each generation of Google’s Cast-enabled media players, such as the Home Mini, Nest Mini, Home, Home Max, Home Hub, Nest Hub, Nest Hub Max, Nest Wifi Point, Chromecast, Chromecast

Audio, Chromecast Ultra, Chromecast with Google TV, and Nest Audio media players, among other media players with built-in Cast functionality, including various other third-party media players with built-in Cast functionality.

## **INTERROGATORIES**

### **INTERROGATORY NO. 6**

Describe, in detail, all facts and circumstances that led to Google's decision to develop the cloud queue technology incorporated into Chromecast enabled devices.

### **INTERROGATORY NO. 7**

Describe, in detail, the scope of the "intellectual property rights" you contend to be the subject of Section 3.4 of the Content Integration Agreement.

### **INTERROGATORY NO. 8**

Describe with specificity any and all "development work done by or on behalf of [Google] in creating the Integrated Service Offering" as described in Section 3.4 of the Content Integration Agreement.

### **INTERROGATORY NO. 9**

Provide the basis for your contention that technology that Google was developing as part of the Content Integration Agreement is "in relevant respects, analogous to technology that Sonos now accuses of infringing its patents." Dkt. No. 32 at 24.

### **INTERROGATORY NO. 10**

Provide a detailed chart comparing the specific features or functions accused of infringing the '615 and '033 Patents in this case with what you contend to be the analogous feature or function developed in 2013-2014 under the Content Integration Agreement. Your response should include, where applicable, pinpoint source code citations for each feature or function.

**INTERROGATORY NO. 11**

To the extent you contend that any development work done by or on behalf of you in creating the Integrated Service Offering pursuant to the Content Integration Agreement reads on the asserted claims of the '615 and/or '033 Patents, provide a chart identifying specifically where and how each limitation of each asserted claim is found within the development work.

Dated: February 19, 2021

Respectfully submitted,

By: /s/ Mark D. Siegmund

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